

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS,  
SCOTT TUROW, and RACHEL VAIL,  
individually and on behalf of others similarly  
situated,

Plaintiffs,

v.

OPENAI INC., OPENAI LP, OPENAI LLC,  
OPENAI GP LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION LLC, OPENAI HOLDINGS  
LLC, OPENAI STARTUP FUND I LP,  
OPENAI STARTUP FUND GP I LLC, and  
OPENAI STARTUP FUND  
MANAGEMENT LLC,

Defendants.

I, Wesley J. Dozier, being duly sworn, declare as follows:

1. I am an attorney with the law firm of Lieff Cabraser Heimann & Bernstein LLP.
2. I submit this affidavit in support of my motion for admission *pro hac vice* in the above-captioned matter.
3. I have never been convicted of a felony.
4. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
5. There are no disciplinary proceedings presently against me.

Dated: November 30, 2023

Respectfully submitted,



Wesley J. Dozier  
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Nashville, TN 37201  
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**STATE OF TENNESSEE  
COUNTY OF DAVIDSON**

Subscribed and sworn before me, a notary public duly qualified and acting in the state  
<sup>30<sup>th</sup></sup>  
and county aforesaid, this 28<sup>th</sup> day of November, 2023.



Notary Public

My commission expires:

11/08/2027

